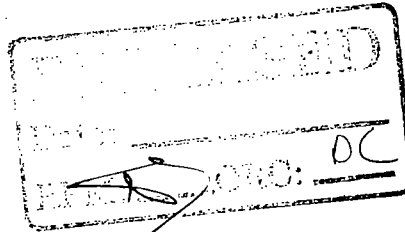


PRC Environmental Management, Inc.

303 East Wacker Drive
Suite 500
Chicago, IL 60601
312-856-8700
FAX# 938-0118

prc

Planning Research Corporation



Site:	Big River Mine
ID #:	MSD92026899
Break:	22.2
Other:	723.16 - 607211 10-31-89

reduced Copy

October 31, 1989

Ms. Maureen Hunt
U.S. EPA Region 7
WSTM/SPFD/PPMG
726 Minnesota Avenue
Kansas City, KS 66101

Subject: EPA Contract No. 68-W9-0006
Work Assignment No. C07011
Work Plan for Potentially Responsible Party Search
for Big River Mine Tailings - Desloge

Dear Ms. Hunt:

PRC Environmental Management, Inc. is submitting one copy of the work plan for the above referenced assignment. The proposed technical approach and cost are addressed in the work plan. The cost estimate portion of this work plan is business confidential. The date by which work must stop if this work plan is not approved is December 2, 1989.

If you have any questions or comments on this work plan, please call me at (913) 281-2277.

Sincerely,

David Homer
Regional Manager

cc: Billie Perry, ZPO (1 copy)
Stephen Kovash, CO (1 copy)
Mark Bogina, WAM (1 copy)
Ed DiDomenico, PRC EMI (letter only)
Robert Van Osten, PRC EMI (1 copy)
Jean Michaels, PRC EMI (1 copy)

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4.2



Superfund

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I have a call into
David Homer to see
if he did revision
12/17/89 MRS



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Planning Research Corporation

**POTENTIALLY RESPONSIBLE PARTY SEARCH
FOR
BIG RIVER MINE TAILINGS - DESLOGE
ST. FRANCOIS COUNTY, MISSOURI**

WORK PLAN

Prepared For

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460**

Work Assignment No.	:	C07011
EPA Region	:	7
Date Prepared	:	October 31, 1989
Site Name	:	Big River Mine Tailings - Desloge
Contract No.	:	068-W9-0006
Prepared by	:	PRC Environmental Management, Inc. Jean Michaels / Bette Ross
Telephone No.	:	312/856-8700
EPA Work Assignment Manager	:	Mark A. Bogina
Telephone No.	:	913/236-2856

Approved:

David Homer
Regional Manager

Robert Van Osten
Financial Manager

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C07011 from the U.S. Environmental Protection Agency (EPA) to conduct a potentially responsible party (PRP) search at the Big River Mine Tailings - Desloge site in St. Francois County, Missouri. The assignment will be conducted in accordance with EPA's PRP Search Manual, dated May 4, 1987 (updated August 1987), and PRP Search Supplemental Guidance, (OSWER Directive No. 9834.3-2a) dated June 16, 1989. This work plan outlines the project approach, work schedule, estimated level of effort hours and costs to complete the work assignment.

1.1 BACKGROUND

The Big River Mine Tailings site is located on approximately 500 acres near the town of Desloge, St. Francois County, Missouri. PRC has received limited information regarding the history of the site. Lead bearing tailings from mining operations were deposited at the site from 1929 through 1958. The tailings were transported via slurry pipelines from a nearby smelter, and piled at depths up to 100 feet inside a horseshoe bend of the Big River. In 1972, property enclosing the site was donated to St. Francois County, which in turn donated it to the St. Francois County Environmental Corporation (SFCEC). SFCEC, a non-profit organization, established a sanitary landfill on the site in 1973.

1.2 STATEMENT OF WORK

The project approach described in this work plan is based on EPA's work assignment, discussions with the EPA work assignment manager (WAM), Mark A. Bogina, and the EPA's PRP Search Manual and Supplemental Guidance documents. In summary, the work involves the following activities:

- Preliminary meeting with EPA
- Document collection, review, and organization
- Title search
- Interviews with government officials
- PRP status and historical summation
- Historical research of site operations
- Report preparation

At EPA's request, PRC may conduct additional activities based on the results of this initial work.

1.3 CONFLICT OF INTEREST

After reviewing the requirements of this work, PRC certifies that, to the best of its knowledge, it has no organizational or personal conflicts of interest that would interfere with the completion of this work assignment.

2.0 PROJECT APPROACH

This section presents PRC's approach to completing this work assignment and lists the deliverables that will be submitted to EPA.

2.1 ACTIVITIES

The following subsections detail the activities for this work assignment.

2.1.1 Kickoff Meeting With EPA

PRC personnel will meet with the EPA WAM, EPA Region 7 civil investigator, site project manager, and assistant regional counsel to discuss: (1) the site background and work assignment objectives; (2) the activities to be completed, including the potential results and limitations of each activity; and (3) state and local government agency involvement. PRC personnel will obtain RCRA/CERCLA Confidential Business Information (CBI) clearance.

2.1.2 File Organization

PRC will obtain all EPA documents pertaining to PRPs and their involvement at the site. PRC will also review other federal, state, county and municipal government files and obtain copies of relevant documents, as directed by the EPA WAM. All relevant documents will be Bates-stamped.

PRC will then establish PRP files according to the Regional File Structure. Each file will have a typewritten label with the appropriate information. PRC will supply all the materials necessary to complete this activity.

2.1.3 File Maintenance

PRC will update and maintain the files at the EPA Region 7 office as new information is received and mailings are conducted. PRC will incorporate all EPA correspondence, subsequent responses and new evidence chronologically into the appropriate files.

PRC will maintain duplicate files of all correspondence for its own use. These files will be locked at all times.

2.1.4 Title Search

A title search will be conducted of the site property, based on boundaries defined by PRC and the EPA WAM. The search will cover the time period from 1958 to the present. The purpose of the title search is to determine the ownership of the site for this time period and obtain information on mortgages, liens, easements, trusts, leases and other title documentation. A history of ownership will be prepared to clearly delineate this information. Maps and certified copies of all pertinent documents will be included in the report, along with a reference list.

PRC will subcontract the title search to a local title company or professional title researcher, through competitive bid procedures. The title search should be completed within 1 1/2 months after the starting date.

2.1.5 PRP Status and Historical Summation

PRC will identify and describe mining companies and other PRPs that have mined, milled or smelted in the St. Francois County area and at the site. PRC will research the corporate history of identified parties. When available, corporate information will include: date of incorporation; current status of the company; fate of inactive companies; current mailing address and telephone number (facility, headquarters, and registered agent); and parent or successor companies. PRC will use the following sources of information to conduct this research:

- Local/Long Distance Telephone Directory
- Libraries
- Secretary of State Offices
- Post Office
- Local Chamber of Commerce
- City and County Clerk or Records Office

- **Tax Assessor's Office**

Information on PRPs that are individuals or privately held companies may not be readily available for review. PRC will obtain guidance from the WAM as these situations arise.

2.1.6 Historical Research of Site Operations

A site description and operational history will be developed. The extent of the research and level of detail required will be discussed beforehand with the WAM.

2.1.7 Report Preparation

PRC will submit monthly progress report to EPA, as well as three additional reports: an interim summary report, a draft PRP Search report, and the final PRP Search report.

The interim summary report will cover the work conducted to date, identify potentially responsible mining companies and those companies rejected for further review, and present the rationale for such decisions.

PRC will submit the PRP Search report in draft and final forms. The report will present the background and history of the site, operational and compliance history, PRP relationships to the site, title search results, interview summaries, and PRP status and history. The project approach, research results, and PRC's recommendations for additional research will also be included. All relevant financial information will be presented in the report. The report will be fully referenced, citing specific sources for all information.

The final PRP Search report will address EPA comments on the draft report and will be submitted 15 days after receiving EPA's comments. Any EPA comments not addressed in the final report will be addressed in a letter of explanation. All reports will be marked "Enforcement Confidential."

PRC will also provide written monthly reports to EPA, covering progress to date, anticipated problems, and possible solutions. PRC will also provide weekly verbal reports to the WAM.

2.2

DELIVERABLES

PRC will submit the following deliverables under this work assignment:

- **Monthly Progress Reports (20th of each month)**
- **Interim Report (Draft)**
- **Final Report (Draft)**
- **Final Report (Final)**

3.0 WORK SCHEDULE

The schedule for this assignment is shown on Figure 1.

4.0 PERSONNEL

Regional Manager

**David Homer (P4), Environmental Scientist
913/281-2277**

Work Assignment Manager

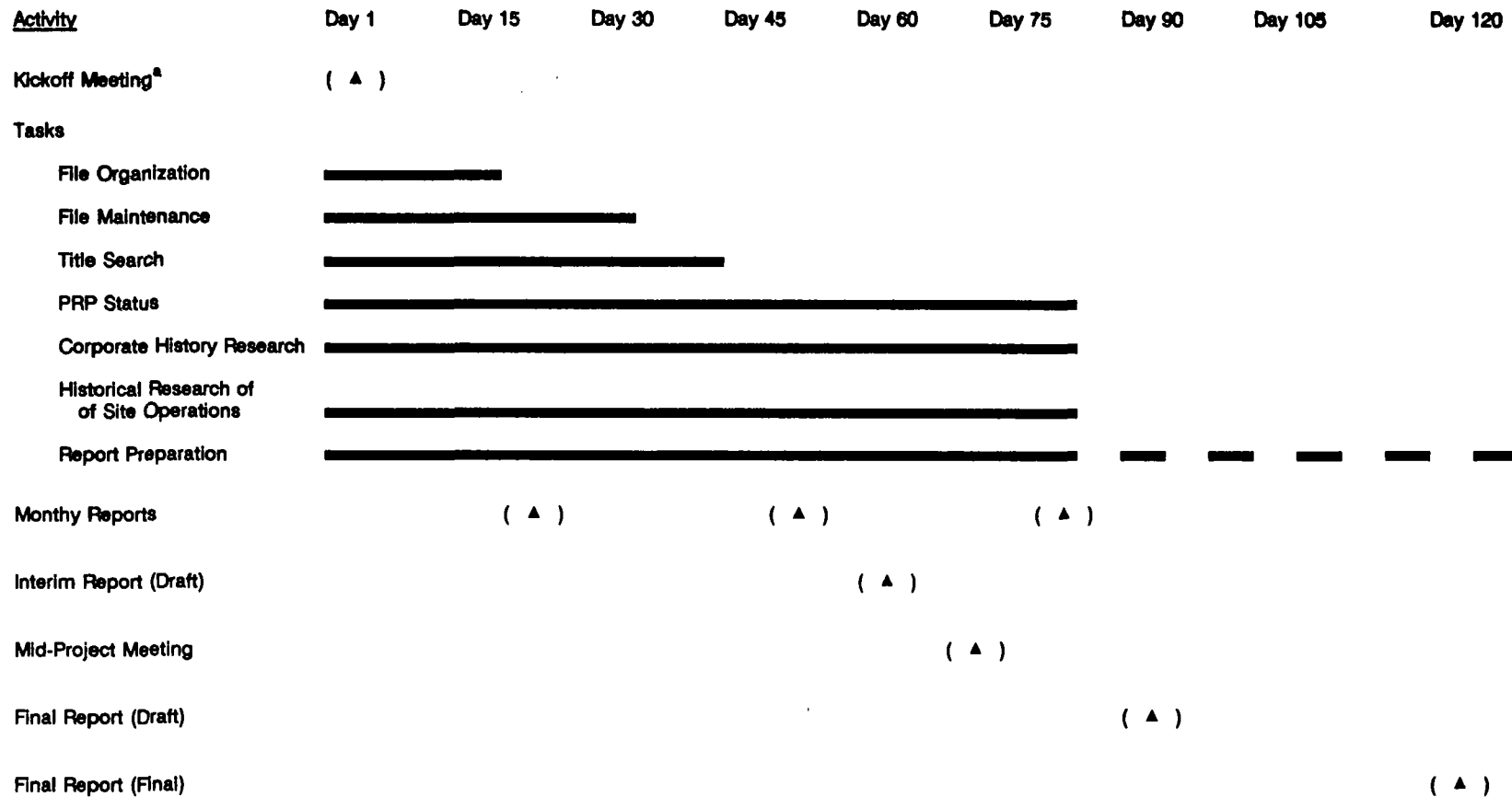
**Jean Micheals (P2), Environmental Engineer
312/856-8700**

Project Staff

**Claudia Vines, Technical Staff (P1)
Bette Ross, Technical Staff (P2)
Glen Barwegan, Technical Staff (P2)
Terry Quirk, Technical Staff (P2)
Carol Edwards, Technical Editor (P3)
Dave Liu, QA/QC Coordinator (P4)**

FIGURE 1

WORK SCHEDULE FOR WORK ASSIGNMENT NO. C07011



^a Work assignment completion dates are pending confirmation of the kickoff meeting ["Day 1"] date, tentatively set for December 4, 1989.

5.0 INTERVIEWS/SUBCONTRACTORS/CONSULTANTS

At the WAM's direction, PRC will interview government officials and other persons who are familiar with the site. EPA does not anticipate the need for private investigation services. If these services are required at a later date, PRC and the WAM will discuss the budget and PRC will request an amendment to the work assignment if necessary.

A title search company will be selected, based on competitive bidding, to conduct the title search. Costs for the title search are included in the cost estimate. However, the extent of research is uncertain at this time. Additional money may be required if the site property history is more complex than anticipated.

6.0 EXCEPTIONS TO THE ASSIGNMENT OR ANTICIPATED PROBLEMS

The work schedule and level of effort (LOE) hours required to complete this work assignment were estimated based on discussions with the WAM, Mark A. Bogina, and on PRC's past experience with PRP searches. If the assignment is found to be more complex than originally anticipated, the WAM will be notified, in advance, of the need for additional LOE hours or dollars. The period of performance for this work assignment is until May 31, 1990.

At the request of the WAM, PRC will provide additional support services, such as:

- Assisting in preparing CERCLA 104(e) letters or special notice letters.
- Reviewing 104(e) letter responses to gain additional site-related information.

Any additional activities may affect the budget and schedule. PRC will discuss the budget and schedule with the WAM as additional activities are requested.

An outside copying service may be used to reproduce documents at the government agencies. Costs for this service are not included in the current cost estimate.

7.0 QUALITY ASSURANCE

PRC's Quality Assurance (QA) Program Plan, dated March 1988, has been incorporated by reference into the TES 9 Contract. Consequently, all activities and deliverables under this work assignment are subject to a contract required program QA or system Quality Control (QC) audit carried out by the auditor or his designee. The program audit results and any required corrective actions will be included in the monthly progress reports.